



Department of Energy

Ohio Field Office
Fernald Closure Project
175 Tri-County Parkway
Springdale, Ohio 45246

JUL 24 2006



Mr. James A. Saric, Remedial Project Manager
United States Environmental Protection Agency
Region V-SRF-5J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-0171-06

Mr. Thomas Schneider, Project Manager
Ohio Environmental Protection Agency
Southwest District Office
401 East Fifth Street
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

**CONTRACT DE-AC24-01OH20115, TRANSMITTAL OF OHIO ENVIRONMENTAL
PROTECTION AGENCY COMMENTS ON THE SILOS AREA NATURAL RESOURCE
RESTORATION DESIGN PLAN, FINAL, REVISION 0**

- References:
- 1) Letter, T. Schneider to J. Reising, "OEPA Comments on the Silos Area Natural Resource Restoration Design Plan, Final, Revision 0", dated May 15, 2006
 - 2) Letter, J. Reising to J. Saric and T. Schneider, "Transmittal of the Silos Area Natural Resource Restoration Design Plan, Final, Revision 0", dated March 31, 2006
 - 3) Letter, J. Saric to J. Reising, "Ohio Environmental Protection Agency Comments on the Silos Area NRRDP, Final, Revision 0", dated May 15, 2006

Enclosed are responses to Ohio Environmental Protection Agency comments on the Silos Area Natural Resource Restoration Design Plan.

If you have any questions or require additional information, please contact me at (513) 648-3139.

Sincerely,


Johnny W. Reising
Director

Enclosure: As Stated

Mr. James Saric
Mr. Thomas Schneider

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DOE-0171-06

cc w/ enclosure:

J. Desormeau, DOE-OH/FCP
G. Stegner, DOE-OH/FCP
C. Jacobson, Stoller
M. Lutz, Stoller
M. Miller, Stoller
J. Powell, DOE-LM/FCP
M. Cullerton, Tetra Tech
S. Helmer, ODH
G. Jablonowski, USEPA-V, SR-6J
D. Sarno, FCAB
T. Schneider, OEPA-Dayton (three copies of enclosures)
M. Shupe, HSI GeoTrans

cc w/o enclosure:

J. Chiou, Fluor Fernald, Inc./MS88
J. Homer, Stoller, MS12
F. Johnston, Fluor Fernald, Inc./MS12
U. Kumthekar, Fluor Fernald, Inc./MS88
L. McHenry, Stoller, MS12
P. Mohr, Fluor Fernald, Inc./MS1
J. Schwing, Fluor Fernald, Inc./MS90
H. Swiger, Stoller, MS12
T. Terry, Fluor Fernald, Inc./MS1
S. Walpole, Stoller, MS76
J. Williams, Fluor Fernald, Inc./MS60

**RESPONSES TO
OHIO ENVIRONMENTAL PROTECTION AGENCY
COMMENTS ON THE
SILOS AREA NATURAL RESOURCE RESTORATION
DESIGN PLAN,
REVISION 0, FINAL**

**FERNALD CLOSURE PROJECT
FERNALD, OHIO**

JULY 2006

U.S. DEPARTMENT OF ENERGY

COMMENTS:

- NAT. RES. \SILOS\SILOSNRRDP\COMMENTS\OEPAC-R 5-15-06.DOC July 19, 2006 11:51 AM

4. Commenting Organization: Ohio EPA Commenter: DSW
Section #: 4.2 Pg #: 4-2 Line #: NA Code: C
Original Comment #: 4
Comment: It is stated that "The slopes of the basins will be graded to no more than 5:1". It is assumed that this means the side slopes. Side slopes are preferred to have as shallow a slope as possible, with at least one side being approximately 15:1. Likewise, the bottom of wetland basins should have a gentle slope rather than being sharply sloping or completely flat.
Response: Restoration grading in the Silos NRRDP is consistent with previous restoration designs at the Fernald site. Slopes will be reduced as much as possible in the field, given the footprint of the land that is available.
Action: No action required.

5. Commenting Organization: Ohio EPA Commenter: DSW
Section #: Sheet G-10 Pg #: NA Line #: NA Code: C
Original Comment #: 5
Comment: Soil amendment appears to end north of where additional amendment is needed. From the southernmost point of the project, north and east is currently roads, parking, and a trailer. This area should also receive soil amendment.
Response: DOE agrees with the comment.
Action: Soil amendments will be applied where needed. These decisions will be made in the field.

6. Commenting Organization: Ohio EPA Commenter: DSW
Section #: Sheet G-10 Pg #: NA Line #: NA Code: C
Original Comment #: 6
Comment: Although not directly part of this project, it appears as though the access road to the well by the arsenic removal area is not included on these drawings. Will that access road be placed along the southeast boundary of this project or will it be placed elsewhere? If elsewhere, will the continuity of the pilot plant drainage ditch be restored (i.e., the road and culvert removed to daylight the stream)?
Response: A gravel road will remain southeast of the project area in order to access EW-26 (adjacent to the arsenic removal area). Therefore, the Pilot Plant drainage ditch culvert will remain.
Action: No action required.

7. Commenting Organization: Ohio EPA Commenter: DSW
Section #: 4.3.2 & drawings Pg #: 4-4 Line #: NA Code: C
Original Comment #: 7
Comment: This restoration includes drainage from the former Silos footprint to Paddys Run and stabilization of the Paddys Run bank in the Silos area. No detail is given other than to state that riprap will be used to stabilize the bank and use of bioengineering techniques will be used when practicable. Detail in both the narrative and drawings is needed to show the flow from the Silos footprint to Paddys Run and the stabilization that will be used.
Response: Stabilization of the east bank of Paddys Run has been discussed in concert with the grade control structure installations included in the Waste pits NRRDP. Based on the walk-down with representatives of the Ohio Environmental Protection Agency and the Ohio Department of Natural Resources on July 5, 2006, a revised path forward for this area has been established.
Action: No action required.

8. Commenting Organization: Ohio EPA Commenter: DSW
Section #: 5.0 Pg #: 5-1 Line #: NA Code: C
Original Comment #: 8
Comment: Monitoring description is insufficient. Monitoring should be at least two years for plant survival. Monitoring requirements should follow the final approved version of the NRRP.
Response: DOE acknowledges the comment.
Action: No action required.

